

November 1, 2021

Mr. David Albright
Manager, Groundwater Protection Section
USEPA Region 9 (WTR-4-2)
75 Hawthorne St
San Francisco, CA 94105

Subject: Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1
Monthly Update for AL Exceedance at Supplemental Monitoring Well M60-O

Dear Mr. Albright:

Florence Copper is providing this monthly update of supplemental monitoring well M60-O alert level (AL) exceedance under Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1 (Permit).

Florence Copper has been voluntarily monitoring M60-O monthly for radon, and last submitted a monthly update report on October 1, 2021. Table 1 (attached) has been updated to include the most recent laboratory results from the monthly sample collected on September 15, 2021 and received on September 30, 2021. Radon exceeded the AL, but the concentrations are trending downward since July. Results from the monthly sample collected on October 19, 2021 are pending.

Rinsing activities continue at the PTF wellfield. Injection into well I-02 was discontinued in August and September to aid rinsing efforts on the east side of the wellfield. In early October, well I-02 began temporarily operating as a recovery well. Also during October, recovery rates in the wellfield were approximately two times greater than the injection rates. Hydraulic gradients were maintained throughout the month.

Florence Copper will continue monthly sampling of M60-O for radon and will report these results monthly to EPA until the concentration of radon is below the AL.

Please feel free to contact me should you have any questions or comments.

Sincerely,
Florence Copper, Inc.

A handwritten signature in dark ink, appearing to read 'Brent Berg', with a long, sweeping horizontal stroke extending to the right.

Brent Berg
General Manager

Cc: Nancy Rumrill, EPA Region 9
Maribeth Greenslade, ADEQ

Table 1. M60-O Monthly Sampling Results

Parameter	UIC AL	UIC AQL	1/7/21	2/22/21	3/23/21	4/14/21	5/18/21	6/15/21	7/19/21	8/24/21	9/15/21
Radon (pCi/L)	2480	--	NA	NA	NA	3073.6 ±308.1	9129 ±915.6	2985.3 ±299.4	3465.5± 347.5	3066.1± 307.7	2991.0± 299.9

BOLD values are exceedance of AL and/or AQL

NA: not analyzed